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Attorneys for Defendants,
CITY OF MANHATTAN BEACH,
RYAN SMALL, CHAD SWANSON,
CHRIS NGUYEN, AND TERESA
MANQUEROS

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

MARK HUTNYAN,

Plaintiff,

v.

DIANE CAFFERATA HUTNYAN;
KRISTIAN HERZOG Also Known As
KRIS HERZOG, Individually and
Doing Business As THE BODY
GUARD GROUP OF BEVERLY
HILLS; COUNTY OF LOS
ANGELES; RICKY TYSON; EDDIE
CARTER; GLENN VALVERDE;
NICOLAS JOHNSTON; GERMAINE
MOORE; CITY OF MANHATTAN
BEACH; RYAN SMALL; CHAD
SWANSON; CHRIS NGUYEN;
TERESA MANQUEROS; and DOES 1
to 10, Inclusive,,

Defendants.

Case No. 2:17-cv-00545-PSG-ASx
[Hon. Philip S. Gutierrez, District
Judge; Hon. Alka Sagar, Magistrate
Judge]

**STIPULATION TO DISMISS WITH
PREJUDICE THE ENTIRE
ACTION AS TO DEFENDANTS
CITY OF MANHATTAN BEACH,
RYAN SMALL, CHAD SWANSON,
CHRIS NGUYEN, AND TERESA
MANQUEROS ONLY FED.R.CIV.P.
41(a)(1)**

Complaint Filed: 01/23/17
Trial Date: N/A

TO THE HONORABLE COURT:

IT IS HEREBY STIPULATED, by and between plaintiff MARK HUTNYAN
and defendants CITY OF MANHATTAN BEACH, RYAN SMALL, CHAD
SWANSON, CHRIS NGUYEN, AND TERESA MANQUEROS, by and through their

1 respective counsel of record, that defendants CITY OF MANHATTAN BEACH,
2 RYAN SMALL, CHAD SWANSON, CHRIS NGUYEN, AND TERESA
3 MANQUEROS be dismissed with prejudice from this action, pursuant to Federal Rule
4 of Civil Procedure, Rule 41(a)(1).

5 IT IS FURTHER STIPULATED, by and between plaintiff and defendants
6 CITY OF MANHATTAN BEACH, RYAN SMALL, CHAD SWANSON, CHRIS
7 NGUYEN, AND TERESA MANQUEROS that this dismissal constitutes a general
8 mutual release of all claims and a mutual waiver of all costs, court fees and
9 attorneys' fees arising out of this litigation between these parties.

10 DATED: October 12, 2017

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

By: /s/ Mildred K. O'Linn

Mildred K. O'Linn
Attorneys for Defendants,
CITY OF MANHATTAN BEACH,
RYAN SMALL, CHAD SWANSON,
CHRIS NGUYEN, AND TERESA
MANQUEROS

18 DATED: October 12, 2017

LAW OFFICES OF GARRY S. MALIN PC

By: /s/ Garry S. Malin

Garry S. Malin, Esq.
Attorney for Plaintiff MARK HUTNYAN